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5 ATTORNEYS FOR PLAINTIFF

6  
7 UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION

10 MICHELE FUKUDA, individually and on  
11 behalf of all others similarly situated,

Case No.: CV 08 0359 JSW

12 Plaintiff,

PLAINTIFF'S INITIAL DISCLOSURES  
PURSUANT TO FED. R. CIV. PROC. 26

13 v.

14 MANN BRACKEN, LLC; DOUG MANN;  
EDWARD REILLY,

15 Defendants. /

16 Pursuant to Rule 26 of the Federal Rules of Civil Procedure, the following are Plaintiff's  
17 initial disclosures:

18 (i) the name and the address and telephone number of each individual likely to have  
19 discoverable information—along with the subjects of that information—that the disclosing party  
20 may use to support her claims or defenses, unless the use would be solely for impeachment or  
21 protected by attorney-client privilege:

22 Ms. Fukuda will testify to receipt of letters attached to the Complaint as Exhibit A, and to  
23 receiving the scripted messages referenced at ¶¶ 13-16 of the Complaint. Ms. Fukuda is  
24 contacted through her attorney, Irving L. Berg, 145 Town Center, PMB 493, Corte Madera, CA  
25 94925, (415) 924-0742.

26 Defendants Mann Bracken, Doug Mann, and Edward Reilly and defendants' employees  
27 will testify to class size, net worth, information on Defendants' business and collection practices,  
28



1 plaintiff's collection letters, and other collection practices.

2 (ii) a copy—or a description by category and location—of all documents, electronically  
3 stored information, and tangible things that the disclosing party has in its possession, custody, or  
4 control and may use to support its claims or defenses, unless the use would be solely for  
5 impeachment, all as follows:

6 Types of messages referenced at ¶¶ 13-16 of the Complaint; copies of Exhibit A attached  
7 to the Complaint.

8 (iii) a computation of each category of damages claimed by the disclosing party is set  
9 forth as follows:

10 \$5,000 for Plaintiff, based on Cal. Civ. Code § 1788.30, Cal. Civ. Code § 1788.17, and  
11 15 U.S.C. § 1692k.

12 \$1,000,000.00 for the class, based on Cal. Civ. Code § 1788.30, Cal. Civ. Code §  
13 1788.17, and 15 U.S.C. § 1692k.

14 Attorney's fees and costs, amount unknown at this time, based on Cal. Civ. Code §  
15 1788.30, Cal. Civ. Code § 1788.17, and 15 U.S.C. § 1692k.

16 (iv) for inspection and copying as under Rule 34, any insurance agreement under  
17 which an insurance business may be liable to satisfy all or part of a possible judgment in the  
18 action or to indemnify or reimburse for payments made to satisfy the judgment:

19 None.

20 Dated: 3/29/08

/s/

21 Irving L. Berg  
THE BERG LAW GROUP

22 ATTORNEY FOR PLAINTIFF  
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